

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JOSHUA YARBROUGH, ET AL.,

Plaintiffs,

vs.

GLOW NETWORKS, INC.,

Defendant.

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CIVIL NO. 4:19-CV-905-SDJ

**PLAINTIFFS' FIRST SUPPLEMENTAL
MOTION FOR REASONABLE FEES AND COSTS**

The prevailing plaintiffs move for reasonable fees and costs in addition to those accounted for in their original motion filed on May 16, 2022. (Doc. 147.) These fees and costs for the most part involve working on the plaintiffs' opposition to the defendant's post-judgment motion (Docs. 150, 171), and on the plaintiffs' reply to the defendant's opposition to the plaintiffs' original motion for reasonable fees and costs (Docs. 147, 170). Brian Sanford and "BB" Sanford worked together on opposition but "on different parts of the same project and under my supervision[;] I was careful that the work did not overlap." (Exh. 1 at ¶ 5.) Robert McKnight worked primarily on the fees-and-costs reply memorandum.

The evidence in support of the motion supports a supplemental award (under 42 U.S.C. § 1988(b) and Fed. R. Civ. P. 54(d)(2)(A)) in the following amounts.

a. A fee of \$71,885:

Lawyer	Hours	Rate	Lodestar Fee
Brian P. Sanford	43.80	\$850	\$37,230.00
Elizabeth "BB" Sanford	46.50	\$400	\$18,600.00
David L. Wiley	3.30	\$650	\$2,145.00
Robert E. McKnight, Jr.	21.40	\$650	\$13,910.00

TOTALS	115.00		\$71,885.00
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- b. Costs in the total amount of \$2,287.74.
- c. Postjudgment interest on \$74,172.74 from the date of filing of this motion.¹

Respectfully submitted,

/s/ Brian P. Sanford

Brian P. Sanford
Texas Bar No. 17630700
Elizabeth “BB” Sanford
Texas Bar No. 24100618

THE SANFORD FIRM
1910 Pacific Ave., Suite 15400
Dallas, Texas 75201
Telephone: (214) 717-6653
Facsimile: (214) 919-0113
bsanford@sanfordfirm.com
esanford@sanfordfirm.com

/s/ Robert E. McKnight, Jr.

Robert E. McKnight, Jr.
Texas Bar No. 24051839
Marek, Griffin & Knaupp
203 N. Liberty Street
Victoria, Texas 77901
Telephone: (361) 573-5500
Facsimile: (361) 573-5040
mcknightr@lawmgk.com

ATTORNEYS FOR PLAINTIFFS
JOSHUA YARBROUGH, ET AL.

¹ Ordinarily, postjudgment interest runs from the date of judgment (here, April 18, 2022). But since the fees and costs requested in this motion accrued after the date of judgment, it appears reasonable to apply interest from the date of this motion.

CERTIFICATE OF SERVICE

On August 18, 2022, I served the foregoing document with all exhibits on all counsel of record via the Court's electronic filing system.

/s/ Robert E. McKnight, Jr.

Robert E. McKnight, Jr.